

U. S. ENVIRONMENTAL PROTECTION AGENCY  
REGION IV, ATHENS, GEORGIA

SOUTH  
SUPERFUND

3.2

MEMORANDUM

APR 16 1992 PM '92

SUBJECT: Revised Sampling and Analysis Plan, RI/FS; 3 2 126  
Olin Corporation, McIntosh Plant;  
McIntosh, Washington County, Alabama;  
ESD Project No. 92E-371

FROM: *for* Roger E. Carlton, Environmental Engineer  
Hazardous Waste Section  
Environmental Compliance Branch  
Environmental Services Division

*Steve Hall 3640*

TO: Cheryl W. Smith, Remedial Project Manager  
AL/GA/MS Remedial Section  
South Superfund Remedial Branch  
Waste Management Division

THRU: William R. Bokey, Chief  
Hazardous Waste Section  
Environmental Compliance Branch  
Environmental Services Division

*William R. Bokey*

The Revised Sampling and Analysis Plan, RI/FS, Olin Corporation, McIntosh Plant, McIntosh, Washington County, Alabama has been reviewed. The following comments are for your consideration:

1. Section 6.3.1, Paragraph 2.

Comment: The use of petroleum jelly and/or lithium grease to lubricate the threads on downhole drilling equipment is not allowed. If the equipment is cleaned (sand blasted if necessary), the threads should be clean enough to tighten without lubricants. If lubricants are necessary, Crisco® or Teflon® tape can be used.

2. Section 6.3.1, Paragraph 3.

Comment: The use of antifreeze should be avoided; however, if antifreeze is used, the pump and hoses should be thoroughly flushed to avoid contaminating the drilling fluids. To insure the pump and hoses are flushed thoroughly, a rinse blank should be collected.

3. Section 6.3.2.1, Page 53, Procedure 1 and 2.

Comment: Butyrate plastic sleeves should not be used to collect samples. Allowable sample collection materials are glass, stainless steel, and Teflon®, respectively.

4. Section 6.3.2.1, Page 54, Procedures 1 and 3.

Comment: See comment #3.

5. Section 6.3.2.3, Paragraph 3.

3 2 1260

Comment: For more complete screening of headspace measurement, both a PID and OVA should be used.

6. Section 6.3.2.5

Comment: The field instruments should be post calibrated any time the instruments are shut down; i.e., lunch time or end of day.

7. Section 6.4.2.1

Comment: There is no mention of mixing the sample prior to placement into the sample container. All samples (except those for volatile organic analysis) should be mixed in accordance with Section 4.2.10 of the US-EPA, Region IV, Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual, February 1, 1991 (SOP).

8. Section 6.7, Paragraph 1, Sentence 1.

Comment: Reference to Section 4.0 of this document for soil collection procedures is not accurate. Section 4 is titled "Field Activities". Please change to correct reference.

9. Section 6.7.1, Reference to Chain-of-Custody Form.

Comment: There needs to be a clarification as to the use of the five blank columns located on the right side of the form. Example: A block across the top of the five columns labeled "ANALYSIS".

10. General.

Comment: Quality control samples for bentonite and sand used in well construction should be collected, but not submitted for analysis until necessary. Additional samples should be collected anytime a new batch or lot number of material is used. In the event water samples collected from the well show contamination unfamiliar to the site, the sand and bentonite samples can be submitted for analysis to determine if they are a source of the contamination.

At least 10% (1 out of 10) of all samples collected should be duplicated for quality control/quality assurance (QA/QC). For information concerning QA/QC see Section 4.6 of the SOP.

Matrix spike samples are typically duplicate samples of water marked for "Matrix Spike" and are collected for each water matrix. This requirement is found in Section 4.6.8 of the SOP.

If you have any questions, please contact me at (404) 546-3351 or (FTS) 250-3351.

cc: Bokey/Hall  
Knight